

# EXHIBIT C

State of Alabama       )  
                                      )  
Montgomery County    )



**NOTICE OF CLAIM FOR DAMAGES**

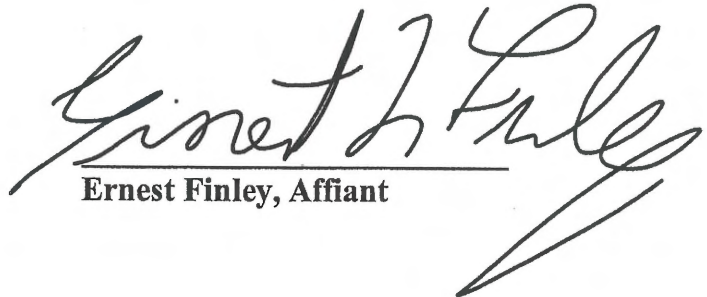
TO: City Clerk  
103 N Perry Street  
Montgomery, AL 36104

COMES NOW Ernest Finley, and, pursuant to the provisions of Section 11-47-23 and 11-47-192 of the Code of Alabama, 1975, files this sworn statement for recovery of damages sustained as a result of personal injuries and says as follows:

1. On or about April 2021, the City, its agents, employees, and the Mayor for the City of Montgomery caused false complaints to be made against me for the purpose of forwarding those complaints to the Alabama Ethics Commission and specifically to investigator Byron Butler of the Ethics Commission. Butler previously worked for the Montgomery Police Department and is a personal friend of several police officers. Butler was previously supervised by Jennifer Reaves, Assistant Chief. After Chief Reaves and I had investigated and disciplined several police officers that were also friends of Butler, the City and its agents conspired with Butler and Cynthia Raulston, General Counsel for the Ethics Commission, in order to bring false ethical complaints against me and to conduct an investigation of those complaints against me. Three weeks after Butler notified me in writing of the ethical complaints against me, the City, specifically Mayor Reed, forced me to resign my employment with the City. I did not want to resign but was told by the Mayor that he was having me removed and it could be easy or difficult. I considered his comments and actions a threat and that I had no choice but to sign the piece of paper he handed me. My resignation was forced by the Mayor because he did not approve that I was enforcing Civil Rights laws of the United States and hired, promoted and disciplined employees regardless of race or gender. Based on false and fabricated evidence created by the City, Butler, and Raulston, the Ethics Commission found that I and Jennifer Reaves each committed a minor violation of the Alabama Ethics Act. The Mayor issued an immediate press release to the media including social media to intentionally disparage and defame me, and to cause me personal and professional harm. When the Alabama Attorney General exonerated and recently cleared me in November 2021 of all

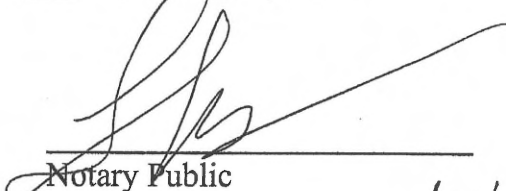
wrongdoing and further exposed that Raulston and Butler had engaged in unethical and illegal acts to present false evidence to the Alabama Ethics Commission, neither the Mayor nor the City issued any type of press or media release but have remained silent, refusing to rectify the professional and reputational harm. I have been caused to suffer physical and emotional harm as a result of these actions and continue to suffer physical and emotional harm.

2. The City of Montgomery, its agents and employees, through its acts of discrimination, harassment, retaliation, negligence, carelessness, recklessness and/or wantonness directly caused my physical and emotional injuries and which continue.
3. Pursuant to the Code of Alabama, Section 11-47-191(c) 1975, I demand of the Mayor or other chief executive officer of the City of Montgomery, Alabama, to furnish me the name of such other person, persons, corporations or entities, as may be liable with the City of Montgomery for my injuries described above.
4. For the above mentioned reasons and for the physical, mental, emotional and economic damages I received as a result of the above-described acts of discrimination, harassment, retaliation, negligence, carelessness, recklessness and/or wantonness, I am making a claim against the City of Montgomery, and any other legal entity thereof, for all maximum damages recoverable and allowable under Federal and State Law, and I believe the value of my claim(s) to be in excess of \$500,000.00.

  
Ernest Finley, Affiant

Before me, Lauren Marie Krothe Branham, a Notary Public, in and for said County and State, personally appeared Ernest Finley, who is known to me and who being first duly sworn to speak the truth, says on oath that the above and foregoing is true and correct.

Sworn and subscribed to me this the 27<sup>th</sup> day of January, 2022.

  
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Notary Public  
My Commission Expires: 11/15/24

